

REMARKS / DISCUSSION OF ISSUES

Claims 1-20 are pending in the application; claims 13-20 are newly added.

The applicants thank the Examiner for acknowledging the claim for priority and receipt of certified copies of all the priority document(s), and for determining that the drawings are acceptable.

Claims are amended for non-statutory reasons: to correct one or more informalities, replace abbreviations with words, remove figure label number(s), and/or to replace European-style claim phraseology with American-style claim language. The claims are not narrowed in scope and no new matter is added. Of particular note, the replacement of mathematical symbols/abbreviations in the claims with equivalent words and phrases does not change the scope of the claims.

The Office action objects to the specification for a typographical error. The specification is correspondingly amended herein; the applicants thank the Examiner for this attention to detail.

The Office action rejects claims 1, 2, 4, 8, and 12 under 35 U.S.C. 103(a) over Bachmann et al. (USP 5,436,673, hereinafter Bachmann) and CCIR Recommendation 601 (ITU-R BT.601-6, hereinafter CCIR601). The applicants respectfully traverse this rejection.

Claim 8 is dependent upon claim 6, which is not rejected over Bachmann and/or CCIR601. Accordingly, the rejection of claim 8 under 35 U.S.C. 103(a) over Bachmann and CCIR601 should be withdrawn.

The combination of Bachmann and CCIR601 does not teach or suggest processing luminance, saturation, and hue parameter values to produce output picture signals based on the hue parameter value and modified luminance and saturation parameter values<sup>1</sup>, as claimed in claim 1, upon which claims 2-12 depend.

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<sup>1</sup> In the original claim 1, the input values are identified as "(Y, S, H)", and the output picture signals are produced with values "(Y', S', H)", where Y' and S' are modified luminance and saturation values, respectively.

The Office action asserts that Bachmann teaches this production of the output picture values based on the hue parameter value and modified luminance and saturation parameter values. The applicants respectfully disagree with this assertion. Bachmann teaches the conventional symmetric technique of modifying all three of the luminance, saturation, and hue values, and does not teach the use of the original hue value in combination with modified luminance and saturation values to produce the output picture signals, as claimed by the applicants. Bachmann specifically teaches identical circuits for modifying each of the luminance, saturation, and hue input values:

"The circuits 13, 14 and 15 are provided for generating the correction signals. Since these circuits are identical with each other, only the circuit 13 in FIG. 1 is shown in detail for simplifying the presentation of this subject matter."

Because Bachmann fails to teach or suggest processing luminance, saturation, and hue parameter values to produce output picture signals based on the hue parameter value and modified luminance and saturation parameter values, the applicants respectfully request the Examiner's reconsideration of the rejection of claims 1, 2, 4, and 12 under 35 U.S.C. 103(a) over Bachmann and CCIR601.

With regard to claims 2 and 4, the Office action asserts that Bachmann teaches raising the saturation input and luminance input, respectively, to a power that depends on the hue input. The applicants respectfully disagree with this assertion. Bachmann fails to teach or suggest an exponential correction being applied to the saturation or luminance inputs. The mere fact that Bachmann uses a lookup table (LUT) to perform the correction does not teach or suggest that Bachmann's lookup table is configured to perform the claimed exponential function. Accordingly, the applicants respectfully maintain that the rejection of claims 2 and 4 under 35 U.S.C. 103(a) over Bachmann and CCIR601 should be withdrawn.

The Office action rejects claims 3 and 5-8, and 10-11<sup>2</sup> under 35 U.S.C. 103(a) over Bachmann, CCIR601, and Udagawa et al. (USP 4,731,662, hereinafter Udagawa). The applicants respectfully traverse this rejection.

Each of the rejected claims is dependent upon claim 1, and in this rejection, the Office action relies on Bachmann and CCIR601 for teaching the elements of claim 1. As noted above, the combination of Bachmann and CCIR601 fails to teach or suggest the elements of claim 1. Accordingly, the applicants respectfully maintain that the rejection of claims 3 and 5-11 under 35 U.S.C. 103(a) over Bachmann, CCIR601, and Udagawa should be withdrawn.

In like manner, claim 3 is dependent upon claim 2, and claim 5 is dependent upon claim 4, and in this rejection, the Office action relies on Bachmann and CCIR601 for teaching the elements of claims 2 and 4. As noted above, the combination of Bachmann and CCIR601 fails to teach or suggest the elements of claims 2 and 4. Accordingly, the applicants respectfully maintain that the rejection of claims 3 and 5 under 35 U.S.C. 103(a) over Bachmann, CCIR601, and Udagawa should be withdrawn.

The Office action rejects claim 9 under 35 U.S.C. 103(a) over Bachmann, CCIR601, and Yamada et al. (USP 5,742,296, hereinafter Yamada). The applicants respectfully traverse this rejection.

Claim 9 is dependent upon claim 6. In this rejection, the Office action relies on Bachmann and CCIR601 for teaching the elements of claim 6; however, the Office action fails to identify where Bachmann and/or CCIR601 teaches or suggests the elements of claim 6. Accordingly, the rejection of claim 9 under 35 U.S.C. 103(a) that relies on Bachmann and CCIR 601 for teaching the elements of claim 6 should be withdrawn.

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<sup>2</sup> The Office action rejects "claims 3, 5, and 6-11"; however, claim 9 is not addressed under this rejection, and is separately rejected over further prior art. The applicants assume that this rejection does not apply to claim 9.

Further, claim 9 is dependent upon claim 2, and as noted above, the combination of Bachmann and CCIR601 fails to teach or suggest the elements of claim 2. Accordingly, the applicants respectfully maintain that the rejection of claim 9 under 35 U.S.C. 103(a) over Bachmann, CCIR601, and Yamada should be withdrawn.

In view of the foregoing, the applicants respectfully request that the Examiner withdraw the objection(s) and/or rejection(s) of record, allow all the pending claims, and find the application in condition for allowance. If any points remain in issue that may best be resolved through a personal or telephonic interview, the Examiner is respectfully requested to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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